

WILMERHALE

November 5, 2021

David W. Bowker

**By ECF and Email**

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The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
Torres\_NYSDChambers@nysd.uscourts.gov

Re: *Altana Credit Opportunities Fund SPC et al. v. Bolivarian Republic of Venezuela*,  
No. 1:20-cv-8402-AT [rel. 1:19-cv-3123-AT]  
Request for Extension of the Court's Deadline for Motion for Default Judgment

Dear Judge Torres:

On behalf of our clients—Altana Credit Opportunities Fund SPC, Altana Credit Opportunities Fund 1 SP, and Altana Funds Ltd. Cayman (collectively, “Plaintiffs”)—I respectfully submit this letter requesting an extension of the Court’s deadline for Plaintiffs’ forthcoming motion for default judgment, from November 15, 2021, to December 15, 2021.

The Court previously provided an extension of the deadline from October 22, 2021, to November 15, 2021. Dkt. 46. Plaintiffs continue to diligently prepare their default judgment submission. Due to the press of business, and in light of the upcoming holidays and needed coordination between counsel and Plaintiffs, who are international clients, Plaintiffs respectfully request that the Court extend the deadline to December 15, 2021.

Sincerely,

/s/ David W. Bowker  
David W. Bowker